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HERBALIFE INTERNATIONAL OF AMERICA, INC.
9800 La Cienega Blvd., Inglewood, CA 90301
Mailing Address: P.O. Box 80210, Los Angeles, CA 90080-0210
(310) 410-9600 • FAX: (310) 258-7124

JOHN P. VENARDOS
Vice President, Regulatory Affairs
International Product Management

June 15, 1998

Office of Special Nutritionals (HFS-450)
Center For Food Safety and Applied Nutrition
FOOD & DRUG ADMINISTRATION
200 C Street, S.W.
Washington, D.C. 20204

RECEIVED 5 6 '98 JUN 30 P2:25

Ref.: **Mega Ginseng Blend Dietary Supplement**

Dear Sir and/or Madam:

Pursuant to 21 CFR 101.93, please be advised that Herbalife International of America, Inc. has begun commercializing Mega Ginseng Blend dietary supplement in the United States.

Mega Ginseng Blend is labeled and promoted with statements provided for in section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act.

LABEL

Suggested Serving: Two tablets per day.

Ginsengs are adaptagens with a long history of use in traditional Chinese herbalism. Mega Ginseng Blend contains a unique mixture of the world's most widely used Ginsengs.

PRODUCT LITERATURE

Eastern cultures have benefited from Ginsengs' remarkable health properties for centuries. Ginsengs are adaptogens which have long been used in traditional Chinese herbalism. Now you can experience the powerful effects of a variety of these ancient Chinese herbs with daily use of our Mega Ginseng Blend.

- Contains a unique mixture of the world's most widely used Ginsengs.

Product labeling prominently bears the required boxed statement, "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

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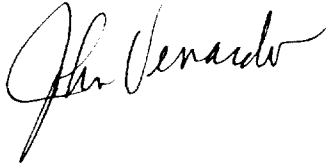
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Herbalife International of America, Inc. certifies that the information contained in this notice is complete and accurate, and that the Company has substantiation that the foregoing statements are truthful and not misleading.

Please do not hesitate to advise should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Vennard". The signature is fluid and cursive, with a long horizontal stroke at the end.

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Herbalife products are available only through Herbalife Independent Distributors.

3011-US-00
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Mega Ginseng Blend

Dietary Supplement
for Good Health and
Well-Being

60 TABLETS

TWO TABLETS PROVIDE:

PANAX GINSENG EXTRACT (4:1)	50 MG
SIBERIAN GINSENG EXTRACT (4:1)	50 MG
ASHWAGANDA EXTRACT (4:1)	25 MG
NOTOGINSENG EXTRACT (4:1)	25 MG
SOUTHERN BLUE GINSENG EXTRACT (4:1)	25 MG
BIO-ABSORPTION COMPLEX-5	23 MG
LECITHIN, ASCORBYL PALMITATE, PLANT CELLULOSE, ENZYME, CINNAMON POWDER AND BIOPERINE® (BLACK PEPPER EXTRACT)	

30-day money back guarantee.
FORMULATED EXCLUSIVELY FOR:
HERBALIFE INTERNATIONAL OF AMERICA, INC.
LOS ANGELES, CA 90080-0210, U.S.A.
MADE IN U.S.A.